

DOUGHERTY, RYAN, GIUFFRA, ZAMBITO & HESSION
Attorneys for Defendants
CONTERM HONG KONG LTD. and VANGUARD LOGISTICS
SERVICES HONG KONG LTD.
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PETER J. ZAMBITO (9362 PZ)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A.,

Plaintiff,

- against -

M/V YM GREEN, her engines, boilers and tackle
in rem, YANG MING MARINE TRANSPORT
CORP., YANGMING (UK) LTD., ALL
OCEANS TRANSPORTATION INC.,
KAWASAKI KISEN KAISHA LTD., CONTERM
HONG KONG LTD., VANGUARD LOGISTICS
SERVICES HONG KONG LTD., FIEGE GOTH
CO., LTD. and SHENZHEN HIGH POWER
TECHNOLOGY CO. LTD.,

Defendants.

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ECF CASE

07 Civ. 7406 (LTS)

**ANSWER TO PLAINTIFF'S
CLAIM FOR INDEMNITY
AND CONTRIBUTION**

Defendants, CONTERM HONG KONG LTD. (hereinafter "CONTERM") and
VANGUARD LOGISTICS SERVICES HONG KONG LTD. (hereinafter "VANGUARD"), as
and for their Answer to plaintiff's Claim for Indemnity and Contribution allege upon information
and belief as follows:

1. Defendants CONTERM and VANGUARD repeat and reallege each and every
paragraph set forth in their Answers to Complaint, Crossclaims, Contingent Crossclaims,

Counterclaims and all pleadings affecting CONTERM and VANGUARD with the same force and effect as if set forth here at length.

2. Denies having sufficient knowledge or information to form a belief as to the allegations contained in paragraphs 13, 15 and 16 of plaintiff's Claim for Indemnity and Contribution.

3. Denies the allegations contained in paragraphs 14 and 17 of plaintiff's Claim for Indemnity and Contribution and denies having sufficient knowledge or information to form a belief as to the co-defendants.

FOR A FIRST, SEPARATE AND COMPLETE DEFENSE

4. CONTERM and VANGUARD adopt all defenses raised in their Answers previously filed, as well as all defenses raised by co-defendants insofar as applicable.

WHEREFORE, defendants CONTERM and VANGUARD demand judgment to dismiss plaintiff's Claim for Indemnity and Contribution, together with the costs, disbursements and reasonable counsel fees and for such other or different relief as to this Court may be just in the premises.

Dated: New York, New York
September 12, 2008

DOUGHERTY, RYAN, GIUFFRA, ZAMBITO & HESSION
Attorneys for Defendants
CONTERM HONG KONG LTD. and VANGUARD
LOGISTICS SERVICES HONG KONG LTD.

S/ _____
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